

United States Environmental Protection Agency Region 10 Emergency Response Unit POLLUTION REPORT

I. HEADING

Date: July 31, 2000

Subject: CleanCare Removal Site (CleanCare), Tacoma, Washington

From: Michael Szerlog, OSC, USEPA, Region 10, Emergency Response Unit

Tel: Office (206) 553-0279

TO: See Distribution List on last page

POLREP No. 33 (Progress)

II. BACKGROUND

Site ID: SSID # 106W
Delivery Order No: 081-10 -02
Response Authority: CERCLA,

CERCLIS No: WASFN1002182

NPL Status: Not Listed (former RCRA site within

Commencement Bay Superfund site)

State Notification: Washington State Department of Ecology referred

site to EPA

Action Memo Status: Signed on December 17, 1999 and January 7, 2000

Removal Start Date: December 17, 1999

Expected Completion Date: March 17, 2001

Site Web Page: www.epa.gov/r10earth, click Index, click C for

CleanCare. or use URL:

http://yosemite.epa.gov/r10/cleanup.nsf/

sites/CleanCare

III. SITE INFORMATION

A. Incident Category

This is a time-critical removal action at an inactive waste management facility.

B. Site Description

1. Site Location

The CleanCare site is located at 1510 Taylor Way in Pierce County, City of Tacoma, Washington at Township 21, Range 3 E. in Section 26. The site comprises approximately 4.2 acres latitude 47° 16' 25" North and longitude 122° 23' 32" West. The site is located in the "Tacoma Tideflats" area about three miles northeast of downtown Tacoma. The site is owned by David Bromley of Bromley-Marr ECOS Inc.

The CleanCare site was an interim status treatment, storage, disposal, and recycling (TSD) facility for off-site generated hazardous and non-hazardous wastes - one of a handful of commercial TSDs operating in the state of Washington. When the facility was in operation its major function was to solidify oily sludge wastes originating from catch basins, sumps, and storm drains; recycle waste oils, antifreeze, and spent solvents; and crush used oil filters for off-site recycling by other facilities.

The CleanCare facility has four separate tank farms (Tank Farm (TF)-1, TF-2, TF-3, and TF-4), two hazardous/dangerous waste container storage pads (container storage (CS) CS-4A and CS-4B), and a processing area where the distillation of solvent, oil, and antifreeze used to occur.

IV. Response Information

A. Situation

1. Current Situation

<u>July 24, 2000 (Monday)</u>

Personnel on site: 1 START, 7 ERRS, 1 USCG, 1 EPA

Weather: Sunny, high of 75-80 F.

All site personnel attended daily safety meeting and discussed site safety/planned activities. START provided oversight and direction to Pacific Industrial Resources regarding the cleanout of underground piping, completed evaluation of soil screening data, selected samples and sampling locations for laboratory analysis, finalized sampling schedule, and discussed geoprobe boring logs and installation fee with

the state DOE. ERRS finished cleaning Baker Tank #8, shipped 19,622 gallons of oily water from baker tanks to Emerald Petroleum Services for disposal there, continued to treat water, continued decontaminating various areas around the site, continued to solidify sludges, and shipped 40 yards of solidified sludge to Waste Management to be land filled. USCG continued routine air monitoring throughout the site, (air monitoring data was below the onsite action level along the perimeter), ensured that unauthorized personnel were not allowed on site and that all personnel entering the site were properly checked in with required safety equipment, conducted site safety.

July 25, 2000 (Tuesday)

Personnel on site: 3 START, 8 ERRS, 1 USCG, 1 EPA

Weather: Overcast in AM, partly cloudy, breezy in PM, 60 to 70 F All site personnel attended daily safety meeting and discussed site safety/planned activities. START continued providing oversight and direction to Pacific Industrial Resources regarding the cleanout of underground piping, collected 5 soil samples for laboratory analysis, prepared and delivered samples to the laboratory: 5 for full suite analysis, and 10 for TPH only. ERRS cleaned Baker Tank #7, cleaned open top trailer, continued to treat water, continued to solidify sludge, continued to decontaminate various areas around the site, and decontaminated equipment. USCG continued routine air monitoring throughout the site, (air monitoring data was below the onsite action level along the perimeter), ensured that unauthorized personnel were not allowed on site and that all personnel entering the site were properly checked in with required safety equipment, conducted site safety.

July 26, 2000 (Wednesday)

Personnel on site: 4 START, 8 ERRS, 1 USCG, 0 EPA Weather: overcast in the morning then clear and 70-80 F All site personnel attended daily safety meeting and discussed site safety/planned activities. START conducted oversight of site activities, created a spread sheet summarizing the pipe cleaning work done by Pacific Industrial Resources, received a zip disk of electronic files from the USCG, reviewed and copied selected paper files from the USCG. ERRS cleaned Baker Tank #10, demobed Baker Tanks #7 and #8, continued to treat water, continued to solidify sludge, continued to decontaminate various areas around the site, and shipped 5,000 gallons of oily water to Emerald Petroleum for treatment and discharge. USCG continued routine air monitoring throughout the site, (air monitoring data was below the onsite action level along the perimeter), ensured that unauthorized personnel were not allowed on site and that all personnel entering the site were properly checked in with required safety equipment, conducted site safety, and demobed from the site.

July 27, 2000 (Thursday)

Personnel on site: 2 START, 8 ERRS, 0 USCG, 0 EPA
Weather: partly cloudy in AM, clear, breezy in PM, 70-80F
All site personnel attended daily safety meeting and discussed site
safety/planned activities. START conducted oversight of activities on
site, oversaw and directed the City of Tacoma sewer camera crew,
started transferring sampling and office equipment from the trailer to the
warehouse and office in building 1, scheduled with a contractor to meet
and discuss underground pipe clean out options. ERRS continued to
treat water, continued to solidify sludge, continued to decontaminate
various areas around the site, shipped 64 drums of acid and lab packs
to Phillips Environmental Services for neutralization, stabilization and
disposal, shipped 5,000 gallons of oily water to Emerald Petroleum for
treatment and discharge, and shipped 20 yards of solidified sludge to
Waste Management to be land filled.

July 28, 2000 (Friday)

Personnel on site: 2 START, 8 ERRS, 0 USCG, 1 EPA

Weather: high scattered clouds, 70-80 F

All site personnel attended daily safety meeting and discussed site safety/planned activities. START conducted oversight of activities on site, completed transferring sampling and office equipment from the trailer to the warehouse and office in building 1, met with a contractor and discussed options available for decontaminating and integrity testing of the underground piping. ERRS shipped 2 drums of flammable liquids to Emerald/SolPro, cleaned and demobed Baker Tank 10, continued to treat water, continued to solidify sludge, decontaminated various areas around the site.

2. Removal Actions to Date

On January 7, 2000, the Action Memorandum to increase site ceiling, to ask for a \$2 million exemption, a 12-month exemption, and a change of scope was signed. A purchase request was also signed and ERRS was funded, incrementally, to begin removal activities.

The City (City of Tacoma Public Works) and State (Washington State Department of Ecology) are providing assistance with the establishment of an interim storm water management plan. For free the City of Tacoma is providing a crew and camera to inspect the underground piping on site.

<u>RCRA Drums</u>: Finished segregation and inventory of all non oil filter drums known to be located on the site (formerly referred to as RCRA

drums). Selected generators have removed a total of 570 drums and 12 totes of waste. Remaining drums undergoing segregation and bulking with similar waste streams prior to disposal. Approximately 1050 empty RCRA drums were removed from the site by Emerald Services.

Oil Sludge Drums: Sludges from miscellaneous drums are being bulked and solidified on site and then transferred by Waste Management to Arlington Landfill.

<u>Antifreeze Drums:</u> Bulked with material from Tank 25 and transported from site by Ecco to Kennewick for recycling.

<u>Solvent Drums</u>: All solvent drums have been disposed of under contract with Safety Kleen.

<u>RCRA Debris</u>: Drums and debris are being solidified and disposed under contract with Philip Services.

<u>Baker Tanks®</u> - A total of 7 Baker Tanks are currently on site. Baker Tanks have been used to stock bulked materials, store treatment system waters, and store material from tank farms prior to disposal. Three Baker tanks were removed from EPA's rental.

<u>Surface Water</u> - Treated and discharged 22 batches to date (approximately 440,000 gallons total) of waste water to the City of Tacoma Sanitary Sewer System. Two batches (approximately 40,000 gallons) did not meet the pretreatment requirements established by the city and were disposed off site.

ASTs -All tanks in TF1 (T1, T3, T4, T5) have been demolished and the scrap steel trucked to Schnitzer Steel under subcontract to the ERRS. All tanks in Tank Farms 2 & 3 are empty of fluids, having been removed and transported by Emerald Services, Solpro, Prime Environmental, Chemical Waste Management (specifics tabulated in section VI). Tank sludges are in the process of being solidified and subsequently transported by Chemical Waste Management to Arlington landfill for final disposition. The oil and sludge from Tank 33 were solidified with other project oil sludges. Tank 34 water has been treated and disposed to the City of Tacoma Sanitary Sewer. Tank Farm 3 material was transported by Emerald (oily water) and Prime (dry oil). Tank Farm 4 material has been hauled by Onyx for disposal in Utah.

<u>Soil -</u> Soil treatment/disposal options have been reviewed. Fourteen soil samples were collected during the assessment phase to characterize site soils. One hundred soil samples have been collected from three

areas on site (Area 1 - within the secondary containment of Tank Farm 1, Area 2 - south of Building 1, and Area 3 - South of Tank Farm 2). Field screening for Diesel range Total Petroleum Hydrocarbons (TPHD) was performed on these samples. A total of 15 samples have been submitted for laboratory analysis: five samples for full suite analysis, and ten for TPHD analysis.

3. Enforcement

The Region currently has some information regarding potential responsible parties (PRPs) at the site. Relevant facility files and documentation have been transported to a secured federal building. EPA intends to gather additional PRP information during the removal action.

B. Planned Removal Activities

To minimize/eliminate the threat to human health and the environment posed by the wastes on the site, the following removal activities are planned:

<u>Drums:</u> final bulking and removal of containers from the site.

<u>Baker Tanks®</u>: Complete the decontamination and removal of Baker Tanks from the site. The decontamination water from the remaining tanks will be disposed off site.

<u>Surface Water:</u> meet with asphalt contractors and do a pre bid walk. Bid asphalt work.

ASTs: Complete removal activities of material from Tank Farm 4.

<u>Miscellaneous Containers</u>: Complete removal and disposal of material from miscellaneous vessels.

C. Next Steps

EPA, ERRS, START, and the USCG Strike Team will continue managing onsite surface water. Development and implementation of a surface water management system for the interim between the EPA removal activity and sale of the property. Continued data management including data for soil screening samples and laboratory samples. Complete solidification of sludges for disposal at Arlington Landfill. Finish bulking material in Baker Tanks®, decontaminate tanks, and return to vendor after material is disposed of. Complete disposal of drumed wastes.

Receive, interpret and report laboratory data for subsurface soil samples. Prepare for the construction of a cap and develop a surface water management plan. Prepare for demobilization from site on August 5, 2000.

D. Key Issues

<u>Security:</u> Off Duty City of Tacoma Police continue with site security.

Management of site surface water: Contact surface water (that which falls within the secondary containment structures) and non-contact water has been either treated on site or disposed off site. On site water treatment is performed in 20,000 gallon batches. Each batch is sampled, laboratory results are submitted to the City of Tacoma, and, with the City's approval, each batch is discharged to the Sanitary Sewer System. Previously, some surface water was also disposed off site. Performing both tasks simultaneously reduced the length of time required to accomplish this task, reduced the associated costs, such as Baker Tank* rental fees, and removed the threat of a release. Currently, managing the surface waters with the temporary on site treatment system is sufficient.

<u>Drum Container Waste:</u> All 64 of the original generators that were given the opportunity to dispose of their wastes have done so. A total of 582 containers of waste were removed from the site by these generators, saving the EPA disposal costs. Other containers of waste are hazcatted, staged with similar compatible wastes, bulked and disposed as appropriate.

On-site facility files: Approximately eight hundred boxes of facility files and documents were transported to a secured federal facility.

I. Cost Information

Estimated costs are summarized below:

	Established Ceiling	Estimated Costs as of date listed, percent of budget expended	
EPA	\$ 300,000	\$ 163,000 (7/27) 54.3%	

START	\$ 676,500	\$ 555,100 (7/27) 82.1%
ERRS	\$ 3,000,000	\$ 2,891,600 (7/27) 96.4%
Coast Guard	\$ 100,000	\$ 123,800 (7/27) 123.8%
Total	\$ 4,076,500	\$ 3,733,500 (7/27) 91.6%

Note: The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

			Containment-		
Waste Stream	Medium	Quantity	Migration Control	Treatment	Disposal
Used Oil Filters	solid and solidified waste	270 cu yd	placed liners in reliefs	removed oil filters from 55 gallon drums and consolidated in reliefs	Waste Management delivered to Olympic View Sanitary Landfill
Used Oil Filter Drums	solid waste	170 cu yd	placed liners in reliefs	crushed drums with an excavator to reduce v olume	Phillips Services Corp. Delivered to Burmingham Steel for recycling.
Used RCRA Drums	solid waste	244 cu yd	placed liners in reliefs	crushed drums with an excav ator to reduce v olume	Phillips Services Corp. Delivered to Columbia Ridge Landfill.
	Solid waste	1050 Drums	placed liners in reliefs	Hauled from site to be decontaminated	Emerald transferred from site to be decontaminated and reused
Generator Drums	sludge and liquids	570 drums and 12 totes	NA	generators contracted with TSDs to properly manage their waste	Brought to various disposal companies
Oily Debris	solidified waste	20 cu yd	placed liners in reliefs	consolidated in reliefs	Phillips Services Corp. delivered to Olympic View Sanitary Landfill
Contact Rain Water	liquid	349,708 gal	contained in Baker Tanks®	Emerald Petroleum Services's (EPS) water treatment plant	EPS treated and transported to City of Seattle Sanitary Sewer
Contact Rain Water	liquid	123,400 gal	contained in Baker Tanks®	Phillips Services Corp. water treatment plant	Phillips Services Corp. treated and transported to City of Tacoma Sanitary Sewer
Contact Rain Water	liquid	440,000 gal	contained in Baker Tanks®	treated on site with temporary waste water treatment system	to City of Tacoma Sanitary Sewer
Baker Tanks®	solid	26 Tanks	NA	pressure washed, and wiped down	returned to Vendor (Baker Tanks®, Inc.)
Tip Trailers	solid	13 trailers	NA	transported off site to make room for other activ ities	temporarily stored at the Phillips Services Corp. facility adjacent to the site

			Containment-		
			Migration		
Waste Stream	Medium	Quantity	Control	Treatment	Disposal
Oil From Drums	liquid	142 drums + 4 totes	6,900 gallon poly tank on site	Transported off site for disposal	Remov ed by Emerald Petroleum with material from Tank 1
Antifreeze from Drums	liquid	65 drums	Bulked into Baker Tank® # 18	transported by Spencer	Deliv ered to Onyx for recycling
Tank Farm 1 Oily Water	liquid	21,100 gal	Bulked into Baker Tank® #10	transportation to be determined	to be determined
Solidified oil sludge	solid	654,000 lbs	in sludge pits	Transported from site	Waste Management transported to Arlington landfill
Tank 1 Layer 1	liquid	73,225 gal	Transferred to Vac Truck	transported by EPS	Delivered to EPS for recycling
Pallets	solid	24.1 tons	stacked in back lot	Transported from site	Burned off site by Recovery One
Tank 1 Layer 2	liquid	34,437 gal	Transferred to Vac Truck	transported by Phillips Services Corp.	Delivered to Phillips Services Corp for recycling
Tank 1 Layer 3	liquid	168,269 gal	Transferred to Vac Truck (74,169 gal) Transferred to Baker Tank® for temporary storage (20,000)	transported by Waste Management	Delivered to Waste Management facility in Arlington, OR for solidification and disposal
Tank 1 Layer 4	liquid	155,904 gal	Transferred to Vac Truck	transported by Emerald	Deliv ered to Emerald facility in Seattle for recycling
A-Fuel/Solvent from Drums	liquid	24,000 gal	Bulked into Baker Tank® #9	10,000 gallons transported off site by Safety Kleen	Deliv ered to Araganite facility in Utah for recycling
Glycol From Drums	liquid	5,000 gal	Bulked into Baker Tank® #18	transportation to be determined	to be determined
PRM Drums	Solid Waste	80 55-gallon drums	Transferred to Philips	Transferred by Philips Services Corp.	Delivered to Philips Services Corp for recycling
Tank-30 Wastewater	liquid	10,371 gal	Transferred to Vac Truck	Transferred by Emerald	Delivered to Emerald for treatment
Tank 5	liquid	44,165 gal	Transferred to Vac Truck	Transferred by Solpro/Prime	Delivered to Solpro/Prime for disposal

Tank 4	liquid	105,074 gal	Transferred to Vac Truck	Transferred by Solpro	Delivered to Solpro for disposal
Tank 5	oily water	24,500 gal	Transferred to Vac Truck	Transferred by Prime	Delivered to Prime for disposal
Tank Farm 2	liquid	62,724	Transferred to Vac Truck	Transferred by Emerald	Delivered to Emerald for disposal
Tank Farm 2	oily water	48,239 gal	Transferred to Vac Truck	Transferred by Emerald	Delivered to Emerald for disposal
Tank 3	Liquid	112,705 gal	Transferred to Vac Truck	Transferred by Solpro	Delivered to Solpro for disposal
Tank 21	Liquid Diesel	4,150 gal	Transferred to Vac Truck	Transferred by Safety Clean	Transported to Anacortes for recycling
Tank Farm 2	liquid	62,724	Transferred to Vac Truck	Transferred by Emerald	Delivered to Emerald for disposal
Tank Farm 2	oily water	48,239 gal	Transferred to Vac Truck	Transferred by Emerald	Delivered to Emerald for disposal
Tank 3	Liquid	112,705 gal	Transferred to Vac Truck	Transferred by Solpro	Delivered to Solpro for disposal
Tank 21	Liquid Diesel	4,150 gal	Transferred to Vac Truck	Transferred by Safety Clean	Transported to Anacortes for recycling
Vendor Drum	Product Drums	8 55-gallon drums	Transferred to VanWaters & Rodgers	Transferred by VanWaters and Rodgers	Transported for resale or use
Tank 5 Layer 2	liquid	9,789 gal	Transferred to Vac Truck	Transported by Emerald	Delivered to Emerald for recycling
Tank 25	Liquid Glycol	8,000 gal	Transferred to Vac Truck	Transported by Ecco	Delivered to Kennewick for recycling
Tank Farm 3 Tank 18	Oil/Water	22,500 gal	Transferred to Vac Truck	Transported by Prime	Delivered to Prime for disposal
Tank Farm 3 Tank 19	Oil/Water	22,500 gal	Transferred to Vac Truck	Transported by Prime	Delivered to Prime for disposal
Tank Farm 4 Tank	Solv ent Waste	10,700 gal	Transferred to Vac Truck	Transported by Onyx	Delivered to Utah for disposal
20 yard sludge boxes	solidified sludge	38,000 pounds	loaded onto truck	Transported by Waste Management	Delivered to Waste Management

Oxidizer Drums	liquid	42 55-gallon drums	Transferred to PSC	Transferred by PSC	Delivered to Kent
Tank Farm 3 Tank 22	Oil/Water	34,326 gallons	Transferred to Vac Truck	Transported by Emerald	Delivered to EPS for disposal
Tank Farm 3 Tank 22	waste oil	8,928 gallons	Transferred to Vac Truck	Transported by Emerald	Delivered to Sol- Pro for disposal
Turbo Oil	Liquid	1,441 gallons	Transferred to Vac Truck	Transported by Emerald	Delivered to Emerald for recycling
Black Poly Tank	Solid	1 Tank	loaded onto truck	Transported b y Baker Tank	Returned to Baker Tank
CleanCare Tanker Truck	Solid	2 Trucks	Drove Off Site	Transported by Emerald	Delivery to Emerald for Reuse
CleanCare Package Truck	Solid	4 Trucks	Loaded onto lowboy trailer	Transported by Emerald	Delivery to Emerald for reuse
Oily Water From Baker Tanks	Liquid	69,703 gallons	Transferred to Vac Truck	Transported by Emerald	Delivery to Emerald for Disposal
Tank Farm 4 A- Fuels	Liquid	16,590 gallons	Transferred to Vac Truck	Transported by Prime Env ironmental	Delivery to Continental Kiln in Hannibel MO.
Consolidated Sludge	Solidified Sludge	100 Yards	loaded onto truck	Transported by Waste Management	Delivered to Waste Management for disposal
Hydrochloric Acid	Liquid	3 55-gallon drums	loaded onto truck	Transported by Sol Pro	Delivered to facility in Chicago
Lab Pack Oxidizers	Liquid	4 drums	loaded onto truck	Transported by Onyx	Deliv ered to Onyx for disposal
Acids and Lab Packs	Liquid	64 drums	loaded onto truck	Transported by Phillips	Delivered to Phillips for neutralization stabilization and disposal
Flammable Liquids	Liquid	2 drums	loaded onto truck	Transported by Emerald/Sol Pro	Delivered to Emerald/Sol Pro for disposal

VII Distribution

To: EPA Headquarters, Washington, D.C., Attention: Terry Eby EPA Region 10, Emergency Response Unit, Attention: Chris Field EPA Washington Operations Office, Attention: Thomas Eaton Puy allup Tribe of Indians, Tacoma, Attention: Joe Edgell Washington State Department of Ecology, Attention: Jim Sachet City of Tacoma Public Works Department, Attention: Michael Kennedy

EPA Region 10 Web page, Attention: Beth Kunz EPA Region 10, Emergency Response Unit, Attention: OSCs

VII Status

Case Pending